

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**THIS DOCUMENT RELATES TO:**

*Robert Garcia v. Zhejiang Pharmaceutical  
Co., et al.*  
*(Case No. 1:20-cv-07957-RBK-JS)*

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**MDL NO. 2875**

**HON. ROBERT B. KUGLER  
DISTRICT JUDGE**

**PLAINTIFFS' CROSS NOTICE OF VIDEOTAPED DEPOSITION OF DR. RUPA  
PUTTAPPA**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – Document 632), Plaintiff will take the cross deposition upon oral examination of Dr. Rupa Puttappa, on **November 2, 2021 at 5:00 p.m. CST**, and continuing until completion, via Zoom video conference. The deposition will be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. Remote access using audio-visual conference technology will be available to permit counsel for the parties to participate from various, separate locations.

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached hereto.

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

Marlene J. Goldenberg  
GoldenbergLaw, PLLC  
800 LaSalle Ave. Ste. 2150  
Minneapolis, MN 55402  
(612) 367-8900  
mjgoldenberg@goldenberglaw.com

Date: October 28, 2021

Respectfully submitted,

/s/ Marlene J. Goldenberg

Marlene J. Goldenberg  
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(612) 367-8900  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of October 2021, I caused a true and correct copy of the foregoing Cross Notice of Videotaped Deposition of Dr. Rupa Puttappa to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on October 28, 2021.

This 28<sup>th</sup> day of October 2021.

/s/ Marlene J. Goldenberg  
*Attorney for Plaintiff*

**EXHIBIT A**

**Documents to be Produced**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.